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State of Louisiana



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M.J. "MIKE" FOSTER, JR.  
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SECRETARY

DEPARTMENT OF NATURAL RESOURCES

February 3, 2003

Mr. Eldon Hout  
Director, NOAA OCRM  
1305 East/West Highway  
11th Floor  
Silver Springs, Maryland 20910

USCG-2002-14134-4

RE: **C20030030**, Coastal Zone Consistency  
**Port Pelican LLC**  
**U. S. Coast Guard**  
Federal License or Permit  
Port Pelican Deepwater Liquified Natural Gas (LNG) Port License Application ,  
Vermilion Block 140, Gulf of Mexico, located 36 miles SW of Fresh Water City,  
**Vermilion Parish, Louisiana**

Dear Mr. Hout:

Pursuant to 15 CFR Section 930.53(a)(2), the Louisiana Department of Natural Resources, Coastal Management Division (CMD) requests NOAA approval to review the above referenced Deepwater Port License application for consistency with the Louisiana Coastal Resources Program (LCRP) as required by Section 307 of the Coastal Zone Management Act of 1972, as amended. Port Pelican LLC has stated in their application (page 6-2) that they believe the project is not subject to the Coastal Zone Management Act because the Port Terminal will be located in federal waters approximately 32 NM off the coast of Louisiana. However, we believe that this project will have effects on the Louisiana Coastal Zone which are reasonably foreseeable. Further, we understand that similar deepwater port projects are being planned by other companies, and request that NOAA's approval for CMD's consistency review be inclusive of all such activities on the Outer Continental Shelf (OCS) off Louisiana.

The proposed project is, in terms of potential coastal effects, very similar to the offshore oil and gas production platforms which abound on the OCS off the Louisiana coast and over which CMD has exercised consistency review for more than twenty years. The construction and operation of this facility will involve the same onshore support bases and similar helicopter and ship traffic. Potential coastal impacts include air, water and noise pollution, bankline erosion due to vessel traffic, saltwater intrusion along navigation canals, transport and disposal of waste, and supply of fresh water. Small, but cumulative, impacts to our highway and pipeline infrastructure

as well as community services such as schools, fire and police protection, and housing, are also to be expected.

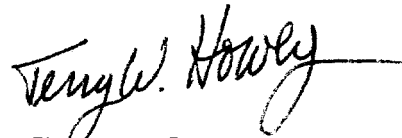
Permits for deepwater ports under the Deepwater Port Act of 1974 are listed federal license and permit activities in the LCRP program document (LCRP Final Environmental Impact Statement (FEIS), Table 10, pg. 141). As noted, CMD routinely reviews similar oil and gas platform projects. For these reasons, we believe the construction of deepwater ports and terminals located in the Outer Continental Shelf off Louisiana, which have shore bases, transport routes, and/or pipeline landfalls within the Louisiana coastal zone, should be subject consistency review by our program.

In addition, Port Pelican LLC anticipates that the proposed facility will be used to import LNG from foreign sources and may require a permit from the Department of Energy. Our list of federal licenses or permits subject to consistency review includes Department of Energy authorizations for the import or export of natural gas (LCRP FEIS Table 10, pg.141). We hereby request NOAA approval to review such authorizations for this and other offshore facilities in the OCS offshore of Louisiana.

By copy of this letter we are informing the applicant, Port Pelican LLC , as well as the U. S. Coast Guard, the Maritime Administration, and the Department of Energy, the federal regulatory agencies involved, of our request to review this type of project.

If you have any questions concerning this request for approval, please contact Jeff Harris of the Consistency Section at (225)342-7949 or 1-800-267-4019.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry W. Howey", with a stylized flourish at the end.

Terry W. Howey,  
Administrator

TWH/JH/bgm

cc: David Kaiser, NOAA  
Joshua Lott, NOAA  
CDR Mark Prescott U. S. Coast Guard  
William Dean, MARAD  
Richard Lammons, Port Pelican LLC  
Mike Smith, DOE

U.S. Department  
of Transportation  
United States  
Coast Guard



COVER SHEET  
Submission to Electronic Docket

To DMS:  
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DOCKET information

USCG- 20 02 - 14134

Title: PORT PELICAN LLC DEEPWATER PORT LICENCE APPLICATION

DOCUMENT TITLE: COMMENT - LOUISIANA DEPT. OF NATURAL RESOURCES

Number of pages (not counting this cover sheet): 2

Document Category

Please scan into the docket as: (Check one)

☐ Supplemental Materials

☐ Federal Register Publication

☒ Comment

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Forwarded by RICH WALTER Phone: 202-267-0128